

## **Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

MRI SOFTWARE, LLC,	)	CASE NO. 1:12-cv-01082 CAB
	)	
Plaintiff,	)	JUDGE CHRISTOPHER A. BOYKO
	)	
v.	)	
	)	JURY TRIAL DEMANDED
LYNX SYSTEMS, INC.,	)	
	)	
Defendant.	)	
	)	

**MRI SOFTWARE, LLC'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO DEFENDANT**

Plaintiff, MRI Software, LLC ("MRI" or "Plaintiff"), submits the following requests for production of documents and things to Defendant Lynx Systems, Inc. pursuant to Rule 34 of the Federal Rules of Civil Procedure and requests that Plaintiff respond in writing and produce the requested documents within 30 days of service hereof or on such other date as may be agreed upon by the Parties or ordered by the Court.

**DEFINITIONS AND INSTRUCTIONS**

MRI incorporates by reference the Definitions and Instructions Set forth in its First Set of Interrogatories to Defendant.

**REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

**Production Request No. 1:** All documents reflecting, memorializing or constituting any agreement between MRI and Lynx, specifically including any purported modification of the 2002 Agreement.

**Production Request No. 2:** All documents that evidence the statements made by Lynx in paragraph 42 of its Answer, that "following MRI's alleged termination of the 2002 Agreement, the relationship between MRI and Lynx continued. For example MRI and Lynx continued to jointly promote and sell MRI software and Lynx's customization products, MRI continued to hold out Lynx as its partner, and Lynx continued to provide maintenance and support of MRI software with MRI's knowledge and consent, and MRI consented to Lynx's continued possession and use of certain MRI software products."

**Production Request No. 3:** The March 30, 2009 letter from MRI's in-house attorney referenced in paragraph 43 of Lynx's Counterclaim, and all documents that refer or relate thereto.

**Production Request No. 4:** The May 8, 2009 "license 'refresh'" referenced in paragraph 49 of Lynx's Counterclaim, and all documents that refer or relate thereto.

**Production Request No. 5:** The August 2009 communication referenced in paragraph 50 of Lynx's Counterclaim, and all documents that refer or relate thereto.

**Production Request No. 6:** Documents sufficient to identify all current and past Lynx MRI Customers.

**Production Request No. 7:** All agreements between Lynx and any Lynx MRI Customer concerning Lynx's provision of MRI Related Services, including without limitation all statements of work or descriptions of MRI Related Services to be provided by Lynx.

**Production Request No. 8:** All documents reflecting or describing any offer by Lynx to provide MRI Related Services, including all communications (including without limitation emails) advertising or promoting same.

**Production Request No. 9:** All communications between MRI and Lynx relating to negotiation of any agreement or any offer to enter into any business arrangement.

**Production Request No. 10:** All documents and things (specifically including but not limited to electronic files on Lynx's network, servers, memory devices or other computer hardware) manifesting or reflecting Lynx's possession or storage of or access to any MRI Software, including specifically all Customizations and Enhancements.

June 20, 2012

Respectfully submitted,

By: /s/ Georgia Yanchar  
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Attorneys for Plaintiff MRI Software LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 2012, I caused the foregoing **MRI SOFTWARE, LLC'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO DEFENDANT** to be served on the below-listed counsel of record by hand:

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/s/ Georgia Yanchar

One of the Attorneys for Plaintiff MRI  
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